



IDAHO DEPARTMENT  
OF HEALTH AND WELFARE  
DIVISION OF  
ENVIRONMENTAL QUALITY

AVESF

2110 Ironwood Parkway, Coeur d'Alene, ID 83814-2648, (208) 769-1422

Philip E. Batt, Governor

May 29, 1998

Gregory A. Rapp  
Construction Services Manager  
Potlatch Corporation  
1100 Railroad Ave  
PO Box 386  
St. Maries, ID 83861

Dear Mr. Rapp:

This letter is in regard to the on-going remediation of the Avery Landing site. This remediation was stipulated in the August 16, 1994 Consent Order (CO) agreement between Potlatch Corporation and the Idaho Department of Health and Welfare (Department), and included the "Remediation Plan for Avery Landing" (Remediation Plan) which was incorporated as part of the CO.

The CO outlined several remedial events that were to take place throughout the course of remedial activities. It appears that some of these requirements are no longer being met. The specific issues are as follows:

- Section D of the Remediation Plan required a water level and product monitoring schedule to be established for the life of the project, after the first year of data from the operation of the Free Product Recovery System (FPRS) was gathered. To our knowledge, this schedule was never submitted.
- Section 4.C of the CO states that Potlatch will provide a three day notification to the Department prior to any sampling event. Over the past three years, this requirement has often not been met.
- Section 4.D.7 of the CO states that a report describing amount of product recovered, effectiveness of the recovery system, and the schedule for the following year's activities will be submitted annually. The 1997 annual report was never submitted to this office.
- Section 4.E of the CO states that the FPRS is to continue to operate until free product thickness is less than 0.1 inch. Site visits as well as correspondence with you have confirmed that the FPRS has not been operating this year.
- Section E of the Remediation Plan requires that any system failure or shutdown lasting more than two days be reported to the Department within two days of detection of such failure. This has consistently not happened.

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May 29, 1998

Page 2

- Section E of the Remediation Plan states that absorbent booms shall be installed to contain seeps into the river, from June 1 to October 31 of each year, during active remediation. This has not always happened over the past three years.
- Section D of the Remediation Plan called for the monitoring of seven existing wells. As of the 2nd quarter monitoring of 1997, only three of the existing wells were still being monitored. Some of these were reported as lost or damaged during construction activities, but the last one to be dropped from the monitoring network - MW-11 - was never explained. The Division of Environmental Quality questions whether a capture zone or product thickness estimate can still be calculated when using so few monitoring wells.

Please provide comment on the above apparent deficiencies of the CO agreements within 30 days of receipt of this letter. If there are problems with meeting the agreed requirements of the CO and Remediation Plan, remember that the CO does allow for modification of the Remediation Plan.

As stated in the CO, work undertaken pursuant to the CO shall not deviate from the agreed terms of the CO without prior notification by Potlatch and approval by the Department. Further, the CO is a binding agreement until terminated in writing by the Department. Failure to comply with the terms of this Consent Order may result in an administrative action or a district court action for specific performance of this Consent Order.

If you have any questions about these issues or would like to schedule a meeting to discuss the status of this site, please contact me at 769-1422.

Sincerely,



Kreg Beck

Hazardous Waste Science Officer

c: Kevin Boling, Potlatch Corp, PO Box 1016, Lewiston, ID, 83501  
Norm Linton, Potlatch Corp, PO Box 386, St. Maries, ID, 83861

## HISTORICAL PROBLEMS WITH REMEDIATION SINCE CO WAS SIGNED IN 8/94

- System not running on several occasions because of pump wiring and setting problems.
- Recovery system pumping petroleum and water to both the storage tank and the infiltration trench.
- A significant portion of the wells that were to be used in quarterly monitoring have disappeared. HC-1R [HC-1], HC-2, HC-3, HC-4, MW-5, MW-11 were the original wells to be used. HC-2, HC-3, and MW-4 are gone and MW-11 isn't always measured.
- Fluctuating river and gw levels have made it difficult to run the recovery system efficiently or keep booms placed correctly in the river.
- Berm for previous contaminated soils was never built. Further, the soil was never treated and never analyzed to show treatment could be terminated.
- System shut-downs and sampling events have not always been noticed to the DEQ.
- Submittal of quarterly and annual reports have not always been timely.